

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

COLE	)	CASE NO. 1:21-cv-00197
	)	
Plaintiff,	)	JUDGE PAMELA A. BAKER
	)	
v.	)	<b><u>ATTORNEY JAMES J. HUX</u></b>
	)	<b><u>MOTION TO WITHDRAW AS</u></b>
NORFOLK SOUTHERN	)	<b><u>COUNSEL FOR PLAINTIFF</u></b>
RAILWAY COMPANY	)	
	)	
Defendants.	)	
	)	
	)	
	)	

Attorneys James J. Hux, hereby respectfully moves this Honorable Court for an order permitting their withdrawal as counsel in the above captioned proceeding, effective as of February 6, 2021. For cause, Counsel submits that he has terminated the attorney-client relationship in accordance with Ohio Rules of Professional Conduct Rule (“ORPC”) 1.16. Counsel has informed Cole that he is withdrawing pursuant to ORPC 1.16 and has provided Cole with a copy of this motion. Counsel’s withdraw would not prejudice Cole and Counsel respectfully ask that the Court grant Cole a period of at least 30 days to seek out new representation.

Respectfully submitted,



---

James J. Hux (0092992)  
**HUX LAW FIRM, LLC**  
3 Severance Circle #18147  
Cleveland Heights, Ohio 44118  
Phone: (937) 315-1106  
Fax: (216) 359-7760  
Email: [jhux@huxlawfirm.com](mailto:jhux@huxlawfirm.com)

*Attorney For Plaintiff Jason Edward Cole*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 3rd day of February 2021, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's filing system.

*s// James J. Hux*

James J. Hux (0092992)